

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

IN RE: TAASERA LICENSING LLC, PATENT LITIGATION	Case No. 2:22-md-03042-JRG
THIS DOCUMENT RELATES TO: CASE NO. 2:22-cv-00303-JRG CASE NO. 2:21-cv-00441-JRG	
TREND MICRO, INC., Plaintiff, v. TAASERA LICENSING LLC, Defendant.	Case No. 2:22-cv-00303-JRG JURY TRIAL DEMANDED
TAASERA LICENSING LLC, Plaintiff, v. TREND MICRO, INC., Defendant.	Case No. 2:21-cv-00441-JRG JURY TRIAL DEMANDED

NOTICE TO CLARIFY THE RECORD

During oral argument on February 21, 2023, counsel for Trend Micro Incorporated (“Trend Micro Japan”) explained the corporate structure between the various Trend Micro entities. To the extent the record suggests that Trend Micro Japan holds or owns the assets of the mentioned subsidiaries, that is not accurate. Counsel was merely attempting to distinguish between Trend Micro Japan’s operations in Japan, as opposed to its ownership of shares in Trend Micro America, Inc. As detailed in Trend Micro, Inc.’s (“Trend Micro U.S.”) Rule 7.1 Disclosure Statement filed in Case No. 2:22-cv-00303-JRG (Dkt. No. 3), Trend Micro America, Inc. is a wholly-owned subsidiary of Trend Micro Japan. Trend Micro U.S. is a wholly-owned subsidiary of Trend Micro

America, Inc. Counsel's understanding is that Trend Micro Japan, Trend Micro America, Inc., and Trend Micro U.S. are distinct corporate entities and observe separate corporate formalities.

Dated: February 22, 2023

Respectfully submitted,

/s/ Melissa R. Smith

Melissa R. Smith
Texas State Bar No. 07921800
GILLAM & SMITH, LLP
303 S. Washington Ave.
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

Holly Engelmann
Texas State Bar No. 24040865
DUANE MORRIS LLP
100 Crescent Court, Suite 1200
Dallas, Texas 75201
Telephone: (214) 257-7200
Facsimile: (214) 257-7201
hengelmann@duanemorris.com

D. Stuart Bartow
DUANE MORRIS LLP
2475 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 847-4150
Facsimile: (650) 618-8505
dsbartow@duanemorris.com

*Counsel for DJ Plaintiff Trend Micro, Inc.
(U.S.) and Defendant Trend Micro,
Incorporated (Japan)*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Plaintiff's counsel of record was served with a true and correct copy of the foregoing document by electronic mail on February 22, 2023.

/s/ *Melissa R. Smith*